

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

MICHAEL BUSH,

Plaintiff,

v.

THE WANG CENTER FOR THE
PERFORMING ARTS, INC. d/b/a Boch
Center,

Defendant.

Case No.: 1:22-cv-10473-GAO

Dear Sir or Madam Clerk:

The Plaintiff, Michael Bush, (hereinafter, “Mr. Bush”), hereby gives notice pursuant to Federal Rule of Civil Procedure 55(a) that the Defendant failed to serve an answer or motion to dismiss within the twenty-one (21) days of being served with the Complaint as required by Federal Rule of Civil Procedure 12(a)(1)(A)(i).

Wherefore, Mr. Bush respectfully requests that this Court enter default judgment against the Defendant pursuant to Federal Rule of Civil Procedure 55(b)(1) which requires that, “If the plaintiff’s claim is for a sum certain or a sum that can be made certain by computation, the clerk—on the plaintiff’s request, with an affidavit showing the amount due—must enter judgment for that amount and costs against a defendant who has been defaulted for not appearing and who is neither a minor nor an incompetent person.”

Respectfully submitted,
The Plaintiff,
Michael Bush,
By his attorney

DATED: April 15, 2022

/s/ Richard C. Chambers, Jr., Esq.
Richard C. Chambers, Jr., Esq.
BBO#: 651251
Chambers Law Office
220 Broadway, Suite 404
Lynnfield, MA 01940
Office: (781) 581-2031
Cell: (781) 363-1773
Fax: (781) 581-8449
Email: Richard@chamberslawoffice.com

CERTIFICATE OF SERVICE

I hereby certify that this document was filed through the ECF system and will therefore be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent this day to those participants indicated as non-registered participants.

DATED: April 15, 2021

/s/ Richard C. Chambers, Jr., Esq.
Richard C. Chambers, Jr., Esq.